

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*IN RE* TERRORIST ATTACKS ON SEPTEMBER 11, 2001

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) No. 03 MDL 1570 (RCC)  
) ECF Case  
)

This document relates to:

ASHTON, *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*, Case No. 02-CV-6977;  
BURNETT, *et al.* v. AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*, Case No. 03-CV-5738;  
BURNETT, *et al.* v. AL BARAKA INVESTMENT & DEVELOPMENT CORP., *et al.*, Case No. 03-CV-9849;  
CONTINENTAL CASUALTY CO., *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*, Case No. 04-CV-05970;  
EURO BROKERS, INC., *et al.* v. AL BARAKA INVESTMENT AND DEVELOPMENT CORP., *et al.*, Case No. 04-CV-07279;  
FEDERAL INSURANCE CO., *et al.* v. AL QAIDA, *et al.*, Case No. 03-CV-6978;  
NEW YORK MARINE AND GENERAL INSURANCE CO. v. AL QAIDA, *et al.*, Case No. 04-CV-6105; and  
WORLD TRADE CENTER PROPERTIES LLC, *et al.* v. AL BARAKA INVESTMENT AND DEVELOPMENT CORP., *et al.*, Case No. 04-CV-07280.

**DR. ABDULLAH BIN ABDUL MOHSEN AL-TURKI'S  
RESPONSE TO PLAINTIFFS' CONSOLIDATED COMPLAINTS**

Defendant Dr. Abdullah Bin Abdul Mohsen Al-Turki, by and through undersigned counsel, respectfully submits his response to the plaintiffs' "consolidated" complaints.

Defendant's motions to dismiss the *Ashton*, *Burnett I*, *Burnett II*, *Continental Casualty*, *Euro Brokers*, *Federal Insurance*, *New York Marine*, and *WTC Properties* complaints are fully briefed.

Subsequently, on September 30, 2005, these plaintiffs filed their "consolidated" complaints, which merely consisted of their complaints supplemented by a total of 132 RICO Statements and Rule 12(e) More Definite Statements. However, none of these supplemental filings has any new allegations about Dr. Al-Turki that has not already been addressed in his

motions to dismiss. Therefore, Dr. Al-Turki requests that this Court consider his fully briefed motions to dismiss in *Burnett I*, No. 85 (April 8, 2004) and No. 360 (July 30, 2004), and in the remaining cases, Nos. 1183-1185 (Sept. 6, 2005) and No. 1301 (Sept. 27, 2005), as his response to the plaintiffs' "consolidated" complaints.

Respectfully submitted,

/s/ Lynne Bernabei

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DATED: October 18, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2005, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

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Alan R. Kabat